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No. 88-1597

IN THE

Supreme Court of the United States

OCTOBER TERM, 1988

THE BOARD OF EDUCATION OF
WESTSIDE COMMUNITY SCHOOLS, et al.,
Petitioners,

v.

BRIDGET C. MERGENS, et al.,
Respondents.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT

BRIEF OF CAMPUS CRUSADE FOR CHRIST, INC., AMICUS CURIAE, IN SUPPORT OF RESPONDENTS

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INTEREST OF AMICUS CURIAE[1]

Amicus Curiae is an inter-denominational, non-sectarian religious organization, the primary purpose of which is to take the Christian message to the people of America and

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[1]Counsel of record to the parties in this case have consented to the filing of this brief and a joint letter of consent has been filed with the Clerk pursuant to Rule 36.

the world. Campus Crusade for Christ, Inc. was founded on the college campuses of America, and a key emphasis since its inception has been to minister to students. In addition to its campus ministry to colleges and universities, Campus Crusade for Christ, Inc. maintains a Student Venture ministry, directed solely to high school students, affecting public secondary school campuses nationwide.

In most instances, ministry to high school students is accomplished with the assistance of student Bible study groups, both on and off campus. That is why *Amicus Curiae* believes that this case, with issues relating to the power of public secondary school officials to regulate student Bible study groups on high school campuses, is of significant concern and importance to our constitutional jurisprudence.

Amicus Curiae seeks to defend the rights of religious liberty on behalf of its own members, the public high school students of America, and all of the people. Campus Crusade for Christ, Inc. and its members are engaged in the exercise of religious rights on the state university and public secondary school campuses of America on a daily basis. Challenges to the free exercise of religious freedom by student groups are often encountered by *Amicus Curiae*, and almost always in the context of the denial of access by school officials. Campus Crusade for Christ, Inc. believes the expertise of its counsel will be of assistance to the Court in this case.

STATEMENT OF THE CASE

This case involves the question of whether public high school officials can prevent a student initiated religious club

from having equal access to school facilities compared to other student initiated clubs.

Students of Westside High School (WHS) may become members of various student groups and clubs, all of which meet after school hours on school grounds. The students may choose from about thirty clubs, each of which has a faculty sponsor. Until appellees requested permission in 1985 to form a religious club known as the Christian Bible Study, no student club had ever been denied access to the school.

The request of appellees was denied on the basis that, in the view of school officials, allowing such a student club would violate the Establishment Clause of the First Amendment.[2] According to school officials, only student clubs which are school initiated and curriculum related are permitted to use school facilities. In essence, the position of appellants is that no student clubs at WHS are actually student initiated or noncurriculum related.

Respondents, however, wanted to form a student initiated club which would be neither school sponsored nor curriculum related. Respondents contend that many of the student clubs at WHS are actually student initiated and noncurriculum related. Accordingly, the Equal Access Act[3] guarantees the right of appellees to form the Christian Bible Study club at WHS.

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[2]The religion clauses of the First Amendment provide that "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof . . .."

[3]20 U.S.C. §§4071-4074 (the EAA).

The District Court held for the appellants on the basis that "WHS need not permit its facilities to be used by a school sanctioned Christian Club."[4] The Court of Appeals, Eighth Circuit, reversed in favor of appellees, holding that "[m]any of the student clubs at WHS . . . are non-curriculum related."[5]

SUMMARY OF ARGUMENT

There is no real conflict between the EAA and the provisions of the First Amendment. Petitioners' conclusion that a student religious club at WHS would violate the Establishment Clause is based upon several false premises. For example, appellants wrongly assume that appellees requested permission to form a school sponsored student club rather than a student sponsored club. Petitioners also incorrectly interpret the EAA as being applicable to a school sponsored student club.

However, appellees attempted to form a club which would be student sponsored. It is student sponsored clubs with which the EAA is concerned, not school sponsored clubs. Consequently, the EAA cannot violate the First Amendment since it applies only to student sponsored clubs. Student sponsored clubs involve no substantive participation by government employees, so there is no state action connected with such clubs. Only a school sponsored club can violate the Establishment Clause because only

[4]*Mergens v. Bd. of Ed. of the Westside Community Schools*, No. CV 85-0-426, slip op. (D.Neb. Feb. 2, 1988) at 15.

[5]*Mergens v. Bd. of Ed. of the Westside Community Schools*, 867 F.2d 1076 (8th Cir. 1989) at 1079.

school sponsored clubs involve state action.

Petitioners also contend that school officials can decide whether student groups are curriculum related for purposes of the EAA, and that all student groups at WHS are school initiated. Again, both of these contentions are wrong.

Amicus Curiae suggests that the Court should presume any student sponsored club to be noncurriculum related under the EAA. Further, it is extremely unlikely that all student clubs at WHS are school initiated. Otherwise, there would have been no need for a procedure by which students could initiate a student club. Consequently, a limited open forum exists at WHS, and the EAA guarantees the right of appellees to form a student religious club at the school.

Accordingly, this Court should either uphold the constitutionality of the EAA or decide that the validity of the EAA is not at issue. In addition, this Court should affirm the right of public secondary students to have equal access to conduct student initiated religious meetings, and affirm the decision below in favor of appellees.

ARGUMENT

I. THE EQUAL ACCESS ACT APPLIES ONLY TO STUDENT INITIATED CLUBS AND DOES NOT UNCONSTITUTIONALLY ESTABLISH RELIGION.

It is a sign of the times when people believe that the free expression of religious ideas by individuals cannot be allowed in the public schools. Such notions would seem

strange to the founders of our nation who, in the Declaration of Independence, staked everything upon the existence of unalienable rights granted by *their Creator*, and based their liberty upon the "*laws of Nature and of Nature's God*."

Such hostility toward religious speech would also shock the Congress which enacted the Northwest Ordinance in 1787, Article III of which provided that: "Religion, morality, and knowledge, being necessary to good government and the happiness of mankind, schools and the means of learning shall forever be encouraged." The direct implication is that schools and religion are allies, not enemies.

In the first question presented to this Court, appellants have asked whether the EAA unconstitutionally establishes religion, if in fact the EAA requires a public high school to officially sponsor a student religious club. Petitioners have argued that to the extent the EAA compels the creation of a school sponsored religious club, the EAA is contrary to the Establishment Clause.

In presenting the question of the constitutionality of the EAA, Petitioners have made three crucial assumptions: 1) school policy requires all student clubs to be school sponsored; 2) appellees requested permission to form a school sponsored club; and 3) the provisions of the EAA apply to student clubs which are school sponsored. However, each of these three assumptions are erroneous, as the following analysis will demonstrate.

A. School Sponsorship Of Student Clubs.

There are two senses in which a student club may be considered school sponsored. In a broad sense, any student club is sponsored when school officials recognize the existence of the club for the purpose of according it the same rights and privileges as other clubs. In a narrow sense, a student club is sponsored only when school officials define, create and control the organization and operations of the club. Petitioners refer to a school sponsored club exclusively in this narrow sense.

Student clubs at WHS are governed by School Board Policy No. 5610, which states, among other things, that "School-sponsored clubs, and organizations are those directly under the control of the school administration, and shall have faculty sponsorship."[6] However, the policy also

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[6]The text of School Board Policy No. 5610 reads in its entirety as follows:

> The Board of Education regards student clubs and organizations as a vital part of the total education program as a means of developing citizenship, wholesome attitudes, good human relations, knowledge and skills.
>
> School-sponsored clubs, and organizations are those directly under the control of the school administration, and shall have faculty sponsorship. The Superintendent shall establish operational guidelines for clubs and organizations which shall function for the welfare and the best interest of the students and the school.
>
> Such clubs and organizations shall not be sponsored by any political or religious organization, or by any organization which denies membership on the basis of race, color, creed, sex or political belief.

refers to non-school sponsored clubs, including "out of school clubs or organizations."

Petitioners view this policy very restrictively, though, and assume there are no non-school sponsored clubs at WHS, but only school sponsored clubs in the narrow sense. At trial, appellants argued that Policy No. 5610 demonstrates clubs must be under the direct control of the school administration, they must have a faculty sponsor, and all such clubs are curriculum related.[7] Upon appeal, appellants stated that

> School district policy requires that all clubs have a faculty sponsor and the school district initiates, supervises, directs and coordinates the activities of all the clubs at the high school.[8]

Consequently, as appellants have interpreted Policy No. 5610, all student clubs at WHS are not only school sponsored in the narrow sense, but they are also *school initiated*. As appellants see it, school initiated clubs are the only kind of student clubs which exist at WHS.

It is easy to understand how appellants might conclude that if the EAA requires the school to officially sponsor a student religious club in the narrow sense, such

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Students participating in out of school clubs or organizations may not identify the clubs as school-affiliated organizations without prior administrative approval.

[7]*Supra*, note 4, at 11.

[8]Summary and Request for Oral Argument, Brief of Appellees before the United States Court of Appeals for the Eighth Circuit.

requirement would involve state employees in religious activities contrary to accepted establishment principles.

Yet, there is a problem with this interpretation of Policy No. 5610. The policy clearly refers to three kinds of student clubs, not just one, each of which is covered by a separate paragraph of the policy.

The opening paragraph of the policy refers to all student clubs in general. The next paragraph describes school sponsored, that is, school initiated clubs. The third paragraph refers to "such clubs," meaning all student clubs, not merely school sponsored clubs, which are sponsored by persons other than school officials. This part of the policy does not prohibit all non-school sponsored clubs, but only those clubs sponsored by political, religious, or certain discriminatory organizations. This paragraph of the policy would make little sense unless it were possible for non-political, etc. outside groups to sponsor a student club, in which case the club would *not* be school sponsored.

In fact, several student clubs are sponsored by non-school groups: Interact is sponsored by Rotary International; Zonta is sponsored by Zonta International; and Subsurfers is sponsored by a private scuba diving business (the faculty "sponsor" essentially serves as a classroom custodian). Finally, the fourth paragraph of the policy refers to "out of school clubs" which may, with administrative approval, be recognized as school affiliated even though they are not school sponsored.

Contrary to appellants' contention, Policy No. 5610 does not require all student clubs at WHS to be school sponsored or school initiated. Petitioners' interpretation is

neither in keeping with the plain text of the policy, nor in keeping with the obvious facts. To claim that all student clubs at WHS are school sponsored or school initiated is erroneous.

B. Respondents' Request For School Recognition.

Petitioners have also misconstrued appellees' request for permission to form a Christian Bible Study club as a request for school sponsorship. As the District Court stated,

> the proposed club would have been identical in its formation, rights, privileges, and obligations to all other WHS clubs with but one exception, no faculty sponsor was proposed unless required.

Further, appellants have claimed the lack of a faculty sponsor to be the fatal flaw in appellees' request:

> The Bible Club or Christian Fellowship Club requested by Bridget Mergens was to be officially endorsed or approved by the school district and was to be identical in its formation rights, privileges, terms and conditions as other Westside High School affiliated student clubs, except that it would not have a faculty sponsor.[9]

Yet, appellees did not petition school officials at WHS for the purpose of having such officials sponsor the Christian Bible Study club. Rather, appellees were the initiators and creators of the club. What they sought from

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[9]*Id.*

school officials was mere recognition, for equal access purposes, in the same sense other non-school sponsored student clubs sought and received recognition at WHS.

In fact, the student club proposed to be formed by appellees was never intended to have a faculty sponsor. Rather, as the court below determined,

> Petitioners stressed to the Board that they were not requesting a faculty sponsor unless required by school policy. If one were required, appellants asserted that the faculty sponsor would only be needed for custodial purposes.[10]

In other words, it was the intention of appellees to form a student initiated and non-school sponsored club at WHS. In essence, appellants denied appellees' request because the club did not conform to the criteria for a school sponsored club. What appellants failed to do was to accord appellees the same right to form a student initiated non-school sponsored club as had been granted to other non-school sponsored clubs.

Thus, for appellants to claim that appellees' request either was, or should have been, a request for school sponsorship of a student religious club is erroneous.

C. Applicability Of The EAA To Student Clubs.

Petitioners' claim that the EAA violates the Establishment Clause springs directly from their assumption that the EAA applies to school sponsored student clubs.

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[10]*Supra,* note 5, at 1077.

However, the provisions of the EAA were not intended to apply to student clubs which are school sponsored in the narrow sense. This is evident from the opening paragraph of the EAA, which requires equal access for any "*students* who wish to conduct a meeting."[11]

For purposes of the EAA, student clubs are presumed to be student initiated *as opposed to* being school sponsored or initiated. If a club is school initiated, it would not fit into the classification of "*students* who wish to conduct a meeting." Consequently, the EAA does not apply to school sponsored student meetings.

Although not necessarily applicable to all cases arising under the EAA, the fair opportunity provisions of the EAA provide further guidance. This safe harbor applies only to meetings which are "voluntary and student-initiated . . . [and] there is no sponsorship of the meeting by the school, the government, or its agents or employees." Thus, what is presumed for all purposes under the EAA is made explicit for safe harbor purposes.

The exclusion of school sponsored student clubs from the scope of the EAA generally would seem to be a necessary result. Otherwise, the EAA would need to apply to "any *school* that wishes to conduct a meeting." Yet, the EAA recognizes the right of students to meet, not the rights of schools or school officials to conduct student meetings.

For this reason, the EAA can never run afoul of the Establishment Clause. Since a student initiated or non-

[11]20 U.S.C. §4071(a) (emphasis added).

school sponsored meeting involves no state action, there can be no violation of the Establishment Clause, because no public official or employee has become entangled with religious activities. If the scope of the EAA is limited to non-school sponsored meetings, no public official is compelled to do what the Constitution forbids.

Similarly, a student initiated club can never violate the Establishment Clause. As appellants have argued, a school sponsored student club is one which is school initiated. Accordingly, a non-school sponsored club must be student initiated. By definition, a student initiated club can never be school sponsored in the narrow sense. Thus, a student initiated club lacks any entanglement of government employees with religion. The presence of student initiated clubs may trigger the applicability of the EAA, but never the Establishment Clause.

This Court has considered many potential violations of the Establishment Clause over the years. Even without reviewing any specific cases at this point, it can be unequivocally stated that the Court has prohibited only state initiated, school sponsored or teacher led religious activity in the public schools, *not* student initiated or student led religious activity.[12] To regard the student initiated club proposed by appellees as violating the Establishment Clause would be unprecedented.

[12]*See, Engel v. Vitale*, 370 U.S. 421 (1962); *School District of Abington Township v. Schempp*, 374 U.S. 203 (1963); *Karen B. v. Treen*, 653 F.2d 897 (5th Cir. 1981), aff'd, 455 U.S. 913 (1982).

D. Guidelines For Statutory Construction.

This Court has long recognized that a federal law should not be interpreted so as to imperil its constitutional validity where it is reasonably open to interpretation free from such peril.[13] Further, when a statute is reasonably capable of having two interpretations, one of which is clearly constitutional, and the other of which is of doubtful constitutionality, the former construction should be adopted.[14]

In this connection, the EAA is capable of two possible interpretations. The first, evidenced by its terms and the legislative history, is that the EAA applies only to student initiated clubs, not school sponsored clubs. Such an interpretation avoids any unconstitutional entanglements with religion under the Establishment Clause. Had appellants recognized the right of appellees to form a student initiated club on the same terms and conditions as other non-school sponsored clubs, the Establishment Clause would not now be at issue.

The second interpretation, advanced by appellants, is that the EAA applies to school initiated clubs. Under this interpretation, the constitutionality of which is doubtful, the EAA may be read as compelling public school officials to participate in religious activities as part of their official duties. However, this interpretation is without any merit.

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[13]*Chippewa Indians of Minn. v. U.S.*, 301 U.S. 358, rehearing denied 302 U.S. 772 (1937).

[14]*Miller v. U.S.*, 78 U.S. (11 Wall.) 268 (1870).

Accordingly, under the rule in *Miller v. U.S.*, the first interpretation should be adopted, and the EAA understood as not in violation of the Establishment Clause.

II. A STUDENT INITIATED CLUB MAY BE PRESUMED TO BE NONCURRICULUM RELATED FOR PURPOSES OF THE EQUAL ACCESS ACT.

In the second question presented to this Court, appellants have asked whether certain types of student clubs are necessarily noncurriculum related for purposes of the EAA. In essence, appellants are asking the Court to decide who has the right, as between school officials and students, to decide whether a public high school has a limited open forum or not. Petitioners have argued that it is the right of school officials to decide whether a limited open forum should exist.

However, appellants have again made three key assumptions which need to be examined: 1) if school officials can decide whether to have a limited open forum or not, then they can also determine whether student groups are curriculum related or not; 2) all school initiated clubs are, by definition, curriculum related; and 3) all student clubs at WHS are school initiated (i.e., a closed forum exists). Of these, the first and last are erroneous, and the second has significant implications which appellants have ignored.

A. The Right To Determine Relatedness.

At trial, appellants provided testimony to the effect that all student clubs at WHS are curriculum related for

purposes of the EAA, and that a limited open forum does not exist at WHS. Petitioners assumed they had the legal right to make both of these determinations. Although this assumption is consistent with appellants' contention that all student clubs at WHS are school initiated, it is nonetheless unwarranted. What appellants failed to realize is that the power to create a closed or limited open forum is separate from the power to decide whether a student group is curriculum related or not. This Court must not commit the same error.

School officials arguably can decide whether or not to allow a limited open forum to exist. The EAA, although requiring equal access to a limited open forum, does not require any public secondary school to *create* a limited open forum. Neither does the EAA, by defining when a limited open forum exists, preclude the possibility that a closed forum may exist if school officials so choose. What the EAA prohibits is the limitation or closing of a limited open forum *after* it has been created.

The areas of discretion and obligation with respect to a limited open forum are well defined. Whether a limited open forum exists is a question of law, at least in the sense that school officials cannot redefine what a limited open forum is. Yet, at the same time, the question of whether to create a limited open forum when one does not already exist is a matter entirely within the discretion of school officials. Thus, insofar as a limited open forum is concerned, school officials have discretion as to its *creation*, but legal obligation as to its *definition*.

Similarly, with respect to the matter of curriculum relatedness, there are areas of discretion and areas of legal

obligation. *Amicus Curiae* suggests that the definition of curriculum relatedness is a matter of legal obligation, not subject to the discretion of school officials. Further, whether to create a noncurriculum related club is within the discretion of students, not school officials.

Consequently, just as students have neither the right to alter the definition of a limited open forum nor to decide whether one should exist, so school officials have neither the right to define what curriculum relatedness is, nor to decide whether to create a noncurriculum related student club.

B. Relatedness Is A Function Of Initiation.

In essence, appellants maintain that all student clubs at WHS are not only *related* to curriculum, but are *part* of the curriculum. According to Dr. Findley, principal of WHS, the school's curriculum "includes required courses, elective courses, and clubs."[15] As appellants see them, the clubs each supposedly serve a curriculum related goal, are sponsored by school teachers, are controlled by the school board, and are in short, part of the WHS program.

Breaking this analysis down into its component parts, appellants contend that since all student clubs are school initiated, and all school initiated activities are part of the curriculum, then all student clubs must necessarily be curriculum related. Certainly, it makes sense that school initiated activities are curriculum related, or that they may at least be presumed to be curriculum related.

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[15]*Supra,* note 4, at 12.

Although *Amicus Curiae* does not concede that *all* school initiated clubs are necessarily curriculum related, there nonetheless is a presumption that such clubs are curriculum related. This presumption arises from the fact that the duties and powers of school officials extend no farther than the scope of the school's educational mission, i.e., the curricular program and activities. To the extent school officials initiate noncurricular activities, these should be insubstantial compared to the curriculum related activities.

Yet, appellants have failed to notice a significant implication of this reasoning, namely, if school initiated activities may be presumed to be curriculum related, then student initiated activities may be presumed to be noncurriculum related. Since it is not the right or duty of students to define or control the school curriculum, it is not within the power of students to initiate a curriculum related club.

School officials define, initiate and control the curriculum and program of the school, not students. Students participate in the curriculum and program of the school, but they neither sponsor it nor control it. The right of curriculum definition belongs exclusively to school officials.

If, as appellants suppose, all student clubs at WHS are school initiated and part of the school curriculum, then they must all be curriculum related. This situation would make WHS a closed forum, *if* the facts are as appellants see them. However, if in fact any student clubs at WHS were student initiated, then there is at least a limited open forum at WHS. Under the EAA, a limited open forum

exists if at least one student club is noncurriculum related,[16] and under the above analysis, a student club is noncurriculum related if it is student initiated.

In short, *Amicus Curiae* suggests that whether a student club is curriculum related is a function of initiation: school initiated clubs are curriculum related and student initiated clubs are noncurriculum related. Of course, it is possible for any school, as does WHS, to simultaneously have some student clubs which are curriculum related and some which are not. There is no presumption under the EAA that the student clubs in any one school must either be all curriculum related or all noncurriculum related.

It is further suggested that school officials have no power to impose school sponsorship on a student initiated group. Otherwise, the EAA would become meaningless. If school officials had the right to change the legal character of a group not initiated by their own actions, it would subvert the students' rights of free speech, free exercise of religion, and free assembly all in one fell swoop.

C. Some Clubs At WHS Are Student Initiated.

If it can be shown that any one of the thirty student clubs at WHS was not school initiated, then a limited open forum exists as a matter of law. Thus, *Amicus Curiae* asks this Court to find that not all student clubs at WHS are school initiated.

There is ample evidence that at least one of the student clubs at WHS was not school initiated. For example,

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[16] 20 U.S.C. §4071(b).

although there was no formal written procedure for the formation of student clubs and organizations, appellants did recognize a *de facto* procedure for student club creation.

According to the court below, students wishing to form a club would normally present their goals and objectives to a school official who analyzes the proposed group's goals and objectives and decides whether or not the group fit into School Board Policy No. 5610.[17] In fact, this was the procedure followed by appellees, who first presented their proposal for a Christian Bible Study club to the principal of WHS.

Obviously, appellees were not the first group of students to have utilized this *de facto* procedure. Respondents were merely following the procedure previously established and used by other student groups. The only difference was that appellees were the first group of students whose request was denied.

Further, as discussed earlier, a number of student clubs are sponsored either by outside organizations or by students wishing to be affiliated with such organizations. Is it to be seriously maintained that Subsurfers, a scuba diving club, in which an outside organization issues diving certificates (presumably by someone who is so licensed), is school initiated and part of the school curriculum? Clearly, Subsurfers is neither school sponsored nor curriculum related.

Consequently, to the extent the Court finds that any one of the thirty existing student clubs at WHS was student

[17] *Supra,* note 5, at 1077.

initiated, rather than school initiated, such club carries the presumption that it is noncurriculum related for EAA purposes. Accordingly, such a finding requires the conclusion that there exists a limited open forum at WHS, rather than a closed forum.

CONCLUSION

Amicus Curiae calls upon this Court to make the fundamental distinction between *state action* in the establishment of a particular religion, on the one hand, and the *actions of individuals* in exercising their religious rights, where the government has done nothing more than secure these rights by statute, on the other hand.

Under this analysis, the EAA cannot reasonably be construed as unlawfully establishing religion. The EAA merely recognizes and secures the equal rights of *individual students* to engage in religious speech when there is a limited open forum. It reasonably applies only to *student* initiated, *student* led clubs, not clubs which are formed and controlled by public schools. Contrary to Petitioners' assertions, the EAA does not require school officials to sponsor, control, or otherwise participate in any student religious activities. It simply requires them to let students form and participate in such voluntary clubs, including clubs where religious ideas will be discussed.

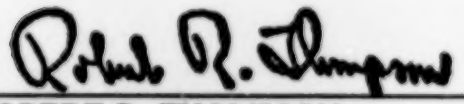
The EAA enhances the freedom of expression of all students without any coercion regarding religion. Therefore, under the facts of this case and sound principles of statutory construction, no conflict whatsoever can be found between the EAA and the Establishment Clause, and the constitutionality of the EAA should be strongly upheld.

Furthermore, to prevent it from being rendered meaningless, the EAA should be construed so as to prevent schools from arbitrarily defeating its protective provisions. Where a limited open forum exists, schools cannot be permitted to impose "state sponsorship" upon a student initiated club. Since it is student initiated clubs which are protected by the EAA, students have the right to define the nature of their club.

Indeed, student initiated clubs may be presumed to be noncurriculum related by virtue of fact that they are *student*, and not *school*, initiated. Thus, in a limited open forum school officials cannot be permitted to annex a student initiated club into the public school curriculum without the consent of the students. Nor can school officials impose "curriculum relatedness" on a student initiated club, and unilaterally defeat the students' rights which are protected under the EAA.

Respondents seek merely to form a voluntary student club in which ideas with religious content and religious significance will be spoken and expressed. As a matter of law, they should not be discriminated against and excluded by school officials from school forums. Since the record clearly reflects that student initiated clubs were permitted at the school, a limited public forum existed as a matter of law and the Equal Access Act, therefore, applies to protect the Respondents' right to form a student initiated religious club.

Respectfully submitted,



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